



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

LDWSF  
LORAR  
2.7.1v2  
8/30/2005

August 30, 2005

Reply to  
Attn Of: ECL-111

Mike Johns  
Windward Environmental  
200 W. Mercer Street, Suite 401  
Seattle, WA 98119

Re: Review of revised memorandum on proposed alternative deliverable schedule for food-web modeling task; Lower Duwamish Waterway Superfund site; Seattle, Washington

Dear Mike:

EPA and Ecology have reviewed the Lower Duwamish Waterway Group's revised memorandum proposing an alternative deliverable schedule for food-web modeling task, dated August 18, 2005. We find that, while some of our comments on the previous draft have been addressed, the revised memorandum is too general for us to determine whether all of the comments in EPA's July 21, 2005 letter to you will be addressed in the upcoming Deliverable 1 and the subsequent proposed deliverables. In lieu of revising this memorandum, it would be sufficient for LDWG to confirm that the deliverables will contain the information requested in our August 18 letter and in this letter.

Listed below are a few comments on the revised memorandum:

**Deliverable 1:** In proposing a model to be used, LDWG should consider ease of agency review, and how they intend to provide both the model software code and the input files so that the agencies can evaluate inputs and recreate the outputs. If LDWG proposes a proprietary model, there will need to be a discussion about how agency reviewers can either obtain the selected model's code or gain temporary access to the code so we can perform our review.

One item of particular concern to us is that LDWG proposes to discuss additional data needs for the food web model (FWM) in Deliverable 3, in March, 2006, instead of Deliverable 1, as requested in our comment letter. Although we recognize that the preliminary model runs will help to identify data needs, this is a critical element that must be addressed as early as possible in the process, in order to allow any additional data collection to occur with minimal impact to the project schedule. This item should be included in the first deliverable.

**Deliverable 2:** We suggest that preliminary model runs be included in Deliverable 2, which can then be refined for Deliverable 3. It will be beneficial for LDWG and the agencies to have an opportunity to discuss more than one iteration of model runs.

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Example model runs will also help us to reach agreement on the items listed for Deliverable 2.

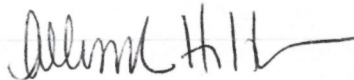
**Deliverable 3:** Either this deliverable or a subsequent deliverable should contain a discussion of what information will be provided with the deliverable containing the final food web model results. For example, the final food web model deliverable should present and discuss all model inputs starting with the conceptual food web model, model equations, inputs, state variables, and continuing through to the presentation and discussion of the final results. Model code (if not already provided to or available to the agencies) and input files should be available on a CD as part of the final deliverable.

**Schedule:** October 27 seems like a short turn around time to incorporate agency comments into the second deliverable. We suggest leaving the schedule as is but considering that this deliverable may need to be delayed if significant concerns are raised in agency comments on Deliverable 1 (for example, if we disagree with LDWG's proposed model). It should be possible to delay this deliverable if necessary without impacting the schedule for the subsequent deliverable.

It is the agency's intent to provide each of the draft deliverables to stakeholders for review, and as such, a stakeholder meeting should be scheduled during the review/discussion period for each deliverable. We should discuss a proposed date for the first stakeholder meeting as soon as possible.

We are looking forward to receiving your first deliverable on September 9. Feel free to call me at (206) 553-2140 if you have any questions about our comments.

Sincerely,



Allison Hiltner  
Superfund Site Manager

cc: Rick Huey, Ecology (hard copy)  
(electronic copies only):  
Jennie Goldberg, City of Seattle  
Jeff Stern, King County  
Skip Fox, Boeing Company  
Doug Hotchkiss, Port of Seattle





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